

UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

|                               |   |  |
|-------------------------------|---|--|
|                               | : | Chapter 11                               |
| In re:                        | : | Case No. 21-19361 (MBK)                  |
| BlockFi Inc., <i>et al.</i> , | : | Chief Judge: Honorable Michael B. Kaplan |
| Debtors. <sup>1</sup>         | : | Hearing Date:                            |

**NOTICE OF MOTION OF THE UNITED STATES TRUSTEE TO COMPEL THE  
DEBTORS TO COMPLY WITH: (i) SECTION 345(b) OF THE BANKRUPTCY CODE;  
AND (ii) THE FINAL CASH MANAGEMENT ORDER**

**TO: ALL PERSONS ON ATTACHED CERTIFICATE OF SERVICE**

**PLEASE TAKE NOTICE** that the United States Trustee, by and through his counsel, shall move before the Honorable Michael B. Kaplan, Chief Judge, on such date as set forth by the Court in the Order Shortening Time, at the United States Bankruptcy Court, District of New Jersey, 402 East State Street, Trenton, New Jersey, for an Order to Compel the Debtors to

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<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154).

Comply with (i) Section 345(b) of the Bankruptcy Code; and (ii) the Final Cash Management Order.

**PLEASE TAKE FURTHER NOTICE** that the United States Trustee shall rely upon the Memorandum of Law and Certification submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that any papers in opposition to the Motion must be filed with the Court and served upon the United States Trustee as set forth in the Order.

**PLEASE TAKE FURTHER NOTICE** that pursuant to District of New Jersey Local Bankruptcy Rule 9013-3(d) oral argument is requested.

ANDREW R. VARA  
UNITED STATES TRUSTEE  
REGIONS 3 & 9

*/s/ Jeffrey M. Sponder*  
Jeffrey M. Sponder  
Trial Attorney

DATED: March 10, 2023